

# **EXHIBIT A**

**I. AGREED CONSTRUCTIONS**

<b>Term</b>	<b>Salazar's Construction</b>	<b>HTC's Construction</b>	<b>Court's Construction</b>
<b>“communications, command, control and sensing system”</b>	[AGREED]	[AGREED]	Plain and ordinary meaning.
<b>“control signals”</b>	[AGREED]	[AGREED]	Plain and ordinary meaning.

**II. DISPUTED TERMS**

<b>Term</b>	<b>Salazar's Construction</b>	<b>HTC's Construction</b>	<b>Court's Construction</b>
<b>“base station”</b>  Claims 10, 14 and 23	Ordinary meaning: the handset and the base station have similar components and function in substantially the same manner. The base station may have additional features, for example: it couples a frequency modulated signal to alternating current (AC) power line; it may be powered by an alternative alternating current (AC) signal and battery power sources; it may provide battery charging for the handset, and it may be coupled to public or private telephone lines.	A device separate from the handset that is structured to transmit signals to and receive signals from the handset, has a telephone line interface that can be used to couple the system to a telephone line, has an AC line FM coupler that can be used to couple FM signals to and from the AC power line and an AC power supply that can be used to provide AC power for operating the base station and charging the handset battery.	
Salazar – <b>“Microprocessor”</b>  HTC- The <b>“Microprocessor” Limitations</b>	Ordinary meaning.	A microprocessor configured to create a plurality of control signals used to operate the communications, command control	

All asserted claims <sup>1</sup>		<p>and sensing system and to create all of the command code sets for [reprogrammable] communication protocols of each of the plurality of external devices with which the system is intended to communicate.</p> <p>As construed, this limitation is invalid as indefinite.</p>	
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<sup>1</sup> Plaintiff asserts claims 1-7, 10, 14, 17, 23, 26-32, and 34 of United States Patent No. 5,802,467.

<p>Salazar – <b>“Memory Device”</b></p> <p>HTC - <b>The “Memory Device” Limitations</b></p> <p>All asserted claims</p>	<p>Ordinary meaning.</p>	<p>This limitation is governed by § 112(f) and the specification fails to disclose corresponding structure.</p> <p>If the Court does not apply 112(f), a memory device configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets (claims 1 and 10)</p> <p>a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical “1’s” and “0’s” as specified by a command code set. (Claim 34)</p>	
<p>Salazar – <b>“Selector”</b></p>	<p>Ordinary meaning.<sup>2</sup></p>	<p>a device that transmits a</p>	

<sup>2</sup> HTC contend this is not what Salazar argued in his Reply Claim Construction Brief – see page 9.

<b>HTC - The “Selector” Limitations</b>  Claims 2, 10, 14, 23, and 26-32		command code set generated by a microprocessor to an external device via either radio frequency or infra-red frequency signals as selected by a user, and receives signals from external devices via both radio frequency and infra-red.	
Salazar – <b>“Data Detector”</b>  <b>HTC- The “Data Detector” Limitation</b>  Claims 10, 14, 23, and 26-32	Ordinary meaning.	a device configured to receive signals from each one of the external devices through the selector and to transmit control signals from the external devices to a microprocessor.	
<b>“command code set”</b>  All asserted claims	Ordinary meaning.	“a set of signals that constitute the universe of signals necessary to perform all of the specific functions in each remotely controlled device.”	
<b>“communication protocols”</b>  All asserted claims	Ordinary meaning.	“sets of rules that allow for two or more devices to communicate wirelessly with one another using a command code set to produce an action in a remotely controlled external device.”	
<b>“parameter sets”</b>  All asserted claims	Ordinary meaning.	“a set of predefined encoded data stored in the memory device that the	

		microprocessor retrieves and uses to recreate a command code set.”	
<b>“backup battery power source”</b>  Claim 14	Ordinary meaning.	“a battery that serves as a substitute or support for a primary power source in a base station portion of the ‘communications ... system.’”	
<b>“a plurality of home entertainment systems”</b>  Claim 26	Ordinary meaning.	“two or more home entertainment systems that are part of the wireless communications command, control and sensing system in addition to the handset and base station.”	
<b>“external device”</b>  All asserted claims	Ordinary meaning.	“a device separate from the handset and base station that is remotely controlled by the handset or base station via a command code set.”	